

EXHIBIT D

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: Lindell Management LLC Litigation

Case No. 23-cv-1433 (JRT/DJF)

**AMENDED RESPONSE OF
LINDELL MANAGEMENT LLC
TO ROBERT ZEIDMAN'S
INTERROGATORY NUMBER 7**

Pursuant to Federal Rules of Civil Procedure 26, 33, and 69, Judgment Debtor Lindell Management LLC amends its response to Robert Zeidman's Interrogatory Number 7 as follows.

GENERAL OBJECTIONS

1. The following responses are made without in any way waiving or intending to waive:

a. All questions as to competency, relevancy, materiality, privilege, and admissibility as evidence of these responses or their subject matter for any purpose, in any subsequent proceeding in this or any other action;

b. The right to object to the use of any said responses, or their subject matter, in any subsequent proceeding in this or any other action;

c. The right to object on any ground at any time to a demand for further response to these or any other interrogatories or other discovery procedures involving or relating to the subject matter of these interrogatories; and

d. The right, at any time, to revise, correct, add to, or clarify any objections or responses.

2. Judgment Debtor objects to each and every interrogatory to the extent it seeks to discover information protected by the work product doctrine or attorney-client privilege, as defined by statute, rule, or common law.

3. Judgment Debtor objects to each and every interrogatory to the extent that it seeks information that is not relevant to the subject matter of the action or is not reasonably calculated to lead to the discovery of admissible evidence.

4. Judgment Debtor objects to each and every interrogatory to the extent that it is unreasonably cumulative or duplicative, seeks information already in the possession of Mr. Zeidman, or is obtainable from a source that is more convenient, less burdensome, or less expensive than Judgment Debtor.

5. Judgment Debtor objects to each and every interrogatory, definition, or instruction, to the extent they seek to impose obligations on Judgment Debtor beyond the requirements of the Federal Rules of Civil Procedure.

6. Judgment Debtor objects to each and every interrogatory to the extent it mischaracterizes evidence, is phrased in a manner that makes the question impossible to answer, and to the extent it is misleading, argumentative, or otherwise improper as to form.

7. Judgment Debtor objects to the definitions and instructions used by Mr. Zeidman to the extent they are vague, ambiguous, compound, or are otherwise inaccurate.

8. Judgment Debtor reserves the right to rely upon additional information uncovered in its continuing investigation of this matter, and to supplement its discovery objections and responses accordingly.

AMENDED RESPONSE

7. Identify all individuals, institutions, and other entities that owe you debts or liabilities, including: (a) the name, address, and telephone number of the debtor; (b) the amount of the debt or liability as of February 22, 2024; (c) whether the debt is secured, and if so, how; (d) the maturity date of the debt; (e) whether any debt has become uncollectable.

RESPONSE:

Aside from minimal, revolving trade debt, and professional fees, Lindell Management's sole debts as of February 22, 2024, are (1) a loan payable to Michael Lindell in the amount of \$529,983.23, (2) a loan payable to My Pillow, Inc. in the amount of \$27,810.23, and (3) a loan payable to Mike Lindell Products LLC d/b/a MyStore in the amount of \$2,137,390.84.

This response amends and replaces Lindell Management's initial response to Interrogatory Number 7, which initial response was incorrect due to a clerical error.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: _____

Michael James Lindell

AS TO OBJECTIONS:

/s/Thomas F. Miller
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